

EXHIBIT C

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

INSIGNIA SYSTEMS, INC.,

Plaintiff,

v.

NEWS CORPORATION, NEWS
AMERICA MARKETING FSI L.L.C.,
AND NEWS AMERICA MARKETING IN-
STORE SERVICES L.L.C.,

Defendants.

Case No. 19-cv-1820

**ELECTRONIC DISCOVERY
PLAN AND PROTOCOL**

Document Production Format

I. Overview

- A. All documents shall be produced as Bates-stamped tagged image file format ("TIFF") images along with an image load/cross reference file, a data load file with fielded metadata, and document-level extracted text for electronically stored information ("ESI") or optical character recognition ("OCR") text for scanned hard copy documents. Details regarding requirements, including files to be delivered in native format, are below.

II. TIFF Image Requirements

- A. All documents shall be produced as TIFF images in 300x300 dpi Group IV single-page monochrome format.
- B. All such images shall be sequentially Bates-stamped using a consistent length with leading zeros in the number. The format of the Bates numbers shall not change across productions.
- C. Images shall include the following content where present:
1. For word processing files (*e.g.*, Microsoft Word) – Comments and "track changes" (and similar in-line editing).
 2. For spreadsheet files (*e.g.*, Microsoft Excel) – Hidden columns, rows, and sheets; comments; and "track changes" (and similar in-line editing).
 3. For presentation files (*e.g.*, Microsoft PowerPoint) – Speaker notes and comments.

- D. Reasonable care shall be taken not to degrade the legibility of documents during the imaging process. If legibility is found to have been degraded, the receiving party may make reasonable requests for re-production of these documents.

III. Native Format Requirements

A. Spreadsheet files

1. Spreadsheet files (*e.g.*, Microsoft Excel) shall be provided in native format.
2. In lieu of a TIFF image version of each spreadsheet file, a Bates-stamped single-page TIFF placeholder file shall be produced along with the native format version of each file.
3. When redaction is necessary, a redacted TIFF image version shall be produced. The parties reserve the right to request access to the native format versions of such files.

B. Multimedia files

1. Multimedia files (*e.g.*, audio or video files) shall be provided in native format.
2. In lieu of a TIFF image version of each multimedia file, a Bates-stamped single-page TIFF placeholder file shall be produced along with the native format version of each file.
3. The parties reserve the right to edit multimedia files using industry standard methods if redaction of such files is deemed necessary.

C. Other files

1. In limited circumstances, it may be necessary to obtain or view the native format versions of files, including color documents/images and dynamic files, such as databases. The parties reserve the right to request access to the native format versions of such files and/or an image format that supports viewing color documents.

IV. Image Load/Cross Reference File Requirements

- A. A single-page image load/cross-reference file shall be provided with each production.
- B. The file should use the Concordance Image Viewer (.OPT) format, as in the sample below. Note, the volume label information ("MSC001" in the sample .opt file) is optional:

Sample Concordance Image Viewer .opt file:

```
MSC000001, MSC001, MSC\0000\00000001.TIF, Y,,, 3
MSC000002, MSC001, MSC\0000\00000002.TIF, ,,,,
MSC000003, MSC001, MSC\0000\00000003.TIF, ,,,,
MSC000004, MSC001, MSC\0000\00000004.TIF, Y,,, 2
MSC000005, MSC001, MSC\0000\00000005.TIF, ,,,,
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V. Extracted Text/OCR Requirements

- A. Extracted text and/or OCR text shall be provided for all documents as separate, document-level text files; extracted text and/or OCR text shall not be embedded in the .DAT file (as defined below).
- B. Document-level text file names shall consist of the beginning Bates number information of the document.
- C. If a document is provided in native format with a single-page placeholder TIFF image (*e.g.*, spreadsheet files), the text file shall contain the full extracted text of the native file.
- D. OCR text shall be provided for all redacted documents in lieu of extracted text.
- E. With respect to produced text files, the specifications herein address ANSI text-based productions. Unicode text-based productions shall be provided for productions containing non-English language documents.

VI. Data Load File Requirements

- A. A data load file shall be provided with each production.
- B. The file shall be a Concordance-loadable data file (".DAT" file) and contain Bates-stamp and metadata information as detailed below.
- C. The delimiters and qualifiers to be used in the .DAT file are:
Record delimiter: Windows newline/Hard return (ASCII 10 followed by ASCII 13)
Field delimiter: ¶ (ASCII 20)
Multi-value delimiter: Semicolon ; (ASCII 59)
Text qualifier: Small thorn þ (ASCII 254)
- D. With respect to .DAT files, the specifications herein address ANSI text-based productions. Unicode text-based productions shall be provided for productions containing non-English language documents.
- E. The .DAT file shall have a header line with the below listed field names and shall include the corresponding information per each applicable field:

Field	Comments	Document Types
BegBates	Beginning Bates number.	All.
EndBates	Ending Bates number.	All.
BegRange	Bates number of first page of family range (<i>e.g.</i> , first page of an email).	All.
EndRange	Bates number of last page of family range (<i>e.g.</i> , last page of last attachment to an email).	All.

Field	Comments	Document Types
PageCount	Number of TIFF image pages in the produced document.	All.
FileExtension	File extension of the original document (e.g., .msg, .docx, .jpg).	All.
FileSize	File size of the original document. Format: bytes.	All.
Title	Title of the original document.	Loose files and attachments.
Custodian	Custodian full name. Format: LASTNAME, FIRSTNAME.	All.
AllCustodian	For globally de-duplicated productions only. Full name of all custodians for whom the document is being produced. Format: LASTNAME, FIRSTNAME; LASTNAME, FIRSTNAME.	All.
Author	Author of document from available metadata.	Loose files and attachments.
From	Email author.	Email only.
To	Email addressee(s).	Email only.
CC	Email addressee(s), carbon copy.	Email only.
BCC	Email addressee(s), blind carbon copy.	Email only.
Subject	Email subject.	Email only.
DateCreated	File creation date. Format: MM/DD/YYYY.	All.
DateModified	File modification date. Format: MM/DD/YYYY.	All.
DateSent	Email sent date. Format: MM/DD/YYYY.	Email only.
TimeSent	Email sent time. HH:MM:SS AM/PM.	Email only.
DateReceived	Email received date. MM/DD/YYYY.	Email only.
TimeReceived	Email received time. HH:MM:SS AM/PM.	Email only.
FilePath	Original path to the file as maintained in the ordinary course of business.	Loose files only.
FileName	Name of file as maintained in the ordinary course of business.	Loose files and attachments.
FolderPath	Path within the mail container file (e.g., PST file) to the message at collection time.	Email only.
HiddenContent	List type of hidden content found in document (for content described in section II.C above)	Loose files and attachments.
TextPath	The production deliverable path to the extracted text or OCR for the document, including the file name.	All.
NativePath	The production deliverable path to the native-format file for the document, including the file name (if a native-format file is provided).	Loose files and attachments.

- F. In globally de-duped, incremental productions, there will be instances when production of documents from additional custodians will include documents previously produced. A Custodian Append overlay load file using the load file format described above shall be provided with an updated AllCustodian field (BegBates and EndBates fields may be used as the unique identifiers).

VII. Additional Considerations

- A. All document family relationships shall be produced together and children files should follow parent files in sequential Bates number order.
- B. Embedded documents shall be extracted from the parent document with family relationship intact.
- C. Productions shall be provided using industry standard encryption software or hardware. Any electronic transmission of produced materials must be done via a secure file transfer system.
- D. If particular documents warrant a different format (*e.g.*, production of color images instead of black and white), the parties shall cooperate to arrange for the mutually acceptable production of such documents.
- E. The parties agree not to knowingly degrade the searchability of documents as part of the document production process. For example, extracted text should not be replaced by OCR text except where appropriate (*e.g.*, OCR for redacted documents).
- F. Redacted documents may have certain metadata fields withheld from production. The parties shall cooperate to create a list of metadata fields which may be produced for these documents.

VIII. Separate Protocol Conditionally Required

To the extent the parties are obligated to produce documents predating February 10, 2011 that were previously produced in prior litigations, the production of those documents shall in the first instance be made in the same form in which such documents were originally produced, without prejudice to the receiving party's right to request additional electronically stored information associated with those documents to the extent it remains reasonably available and without prejudice to the producing party's right to object to such a request. To the extent the parties are obligated to produce documents predating February 10, 2011 that were not previously produced in prior litigations, the parties agree to meet and confer in good faith about modifications to this protocol that the producing party believes are needed given the age of such documents.